

Fees for Plaintiff's First Motion to Compel

Date	Narrative	Attorney	Hours	Amount
09/01/2020	Researching and drafting SWA motion to compel; review SWA supplemental letter re sanctions and discuss with co counsel	Gilliam, Matt B	7.3	\$2,555.00
09/08/2020	Researching and drafting SWA Motion to Compel	Gilliam, Matt B	4.6	\$1,610.00
09/09/2020	Researching and drafting SWA Motion to Compel	Gilliam, Matt B	3.9	\$1,365.00
09/10/2020	Researching and drafting SWA Motion to Compel	Gilliam, Matt B	6.4	\$2,240.00
09/11/2020	Researching and drafting SWA Motion to Compel; reviewing L556 response to motion to compel; discussing SWA motion to compel with co counsel; reviewing and editing JDJ letter to client about documents	Gilliam, Matt B	6.5	\$2,275.00
09/14/2020	Researching and drafting SWA Motion to Compel; reviewing L556 response to motion to compel with client; discussing status of case with client	Gilliam, Matt B	9.3	\$3,255.00
09/15/2020	Researching and drafting SWA Motion to Compel; reviewing Court order setting hearing	Gilliam, Matt B	6.4	\$2,240.00
09/16/2020	Researching and drafting SWA Motion to Compel; emailing L556 counsel about meeting in advance of hearing; emailing Correll re SWA discovery issues	Gilliam, Matt B	4.4	\$1,540.00
09/17/2020	Researching and drafting SWA Motion to Compel; schedule discovery meeting with L556 counsel	Gilliam, Matt B	4.1	\$1,435.00
09/22/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix	Gilliam, Matt B	5.7	\$1,995.00
09/23/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix; reviewing Court order and discussing order with client	Gilliam, Matt B	8.1	\$2,835.00
09/24/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix; discussing settlement with Local 556 and SWA; communicating with client about settlement discussions	Gilliam, Matt B	7.5	\$2,625.00
09/25/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix	Gilliam, Matt B	6.2	\$2,170.00
09/29/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix; preparing for SWA discovery issues meeting; discussing discovery issues and status of case with client	Gilliam, Matt B	10.5	\$3,675.00
09/30/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix	Gilliam, Matt B	6.3	\$2,205.00
10/01/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix; communications with local counsel re case discovery issues; emailing Local 556 about discovery issues and planning	Gilliam, Matt B	7.1	\$2,485.00
10/02/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix	Gilliam, Matt B	8.6	\$3,010.00
10/05/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix; case management; discussing and analyzing motion to extend deadlines to complete fact discovery; emailing Local 556 and SWA re discovery issues	Gilliam, Matt B	6.3	\$2,205.00
10/06/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix	Gilliam, Matt B	10.0	\$3,500.00
10/07/2020	Researching, drafting, and revising Southwest motion to compel; preparing appendix; meeting with Local 556 re discovery issues (1.8)	Gilliam, Matt B	8.4	\$2,940.00

10/08/2020	Revising Southwest motion to compel; appendix	Gilliam, Matt B	5.1	\$1,785.00
10/09/2020	Revising Southwest motion to compel; appendix; preparing email to SWA re discovery issues	Gilliam, Matt B	6.0	\$2,100.00
10/13/2020	Reviewing SWA motion to compel strategy; discussing discovery issues and strategy with co counsel; responding to SWA questions about Carter discovery responses	Gilliam, Matt B	9.4	\$3,290.00
10/14/2020	Revising SWA motion to compel and appendix; discovery issue communications with SWA; discussing case updates and SWA discovery issues with client; reviewing client info for responsiveness to SWA discovery requests	Gilliam, Matt B	12.7	\$4,445.00
10/21/2020	Revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues	Gilliam, Matt B	7.6	\$2,660.00
10/22/2020	Revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues; incorporating co counsel edits to motion to compel documents	Gilliam, Matt B	8.5	\$2,975.00
10/23/2020	Revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues; preparing for SWA depositions; analyzing case strategy and planning	Gilliam, Matt B	9.7	\$3,395.00
10/24/2020	Revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues	Gilliam, Matt B	6.4	\$2,240.00
10/25/2020	Revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues	Gilliam, Matt B	3.6	\$1,260.00
10/27/2020	Preparing for ES deposition; reviewing SWA subpoenas for Carter medical records and analyzing same with co counsel; revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues; drafting motion to extend discovery deadlines	Gilliam, Matt B	10.7	\$3,745.00
10/28/2020	Preparing for MJ deposition; reviewing SWA subpoenas for Carter medical records and analyzing same with co counsel; revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues	Gilliam, Matt B	10.5	\$3,675.00
10/29/2020	Preparing for ME deposition and SWA 30b6 deposition; reviewing SWA subpoenas for Carter medical records and analyzing same with co counsel; communicating with SWA and co counsel re discovery disputes; revising and updating SWA motion to compel and appendix based on continuing discussions and narrowing of issues	Gilliam, Matt B	9.2	\$3,220.00
11/07/2020	Drafting motion to extend discovery deadlines; revising Southwest motion to compel based on continuing discussion of issues	Gilliam, Matt B	7.9	\$2,765.00
11/10/2020	Revising SWA motion to compel based on continuing discussion of discovery issues; reviewing and revising Local 556 deposition notice and 30b6 topics for examination	Gilliam, Matt B	8.0	\$2,800.00
11/11/2020	Revising SWA motion to compel and appendix based on continuing discussion of discovery issues; preparing Carter supplemental production to SWA responses	Gilliam, Matt B	9.7	\$3,395.00
11/12/2020	Revising SWA motion to compel and appendix based on continuing discussion of discovery issues; preparing Carter supplemental production to SWA responses; preparing for Carter client deposition; communications with client about case updates	Gilliam, Matt B	13.3	\$4,655.00

11/13/2020	Finalizing and filing SWA motion to compel and appendix; preparing Carter supplemental production to SWA responses	Gilliam, Matt B	12.1	\$4,235.00
12/05/2020	Preparing reply to SWA motion to compel	Gilliam, Matt B	4.4	\$1,540.00
12/07/2020	Preparing reply to SWA motion to compel	Gilliam, Matt B	12.7	\$4,445.00
12/08/2020	Revising reply to SWA motion to compel	Gilliam, Matt B	11.4	\$3,990.00
12/09/2020	Revising and filing reply to SWA motion to compel	Gilliam, Matt B	12.5	\$4,375.00
12/10/2020	Communicating with local counsel about hearing on SWA motion to compel	Gilliam, Matt B	0.5	\$175.00
12/11/2020	Preparing for hearing and verifying that hearing would take place; attend hearing by zoom	Gilliam, Matt B	6.4	\$2,240.00
				\$117,565.00

10/21/2020	Research & edit motion to compel, emails re same	Chappell, Milton L	0.9	\$360.00
10/23/2020	Research, emails & p/c MBG re status & strategy of discovery, depositions & motion to compel	Chappell, Milton L	1.3	\$520.00
10/26/2020	Research & emails re status & strategy of discovery, depositions, motion to compel	Chappell, Milton L	0.6	\$240.00
10/27/2020	Research, emails & p/c MBG & JDJ re status & strategy for discovery, depositions & motion to compel, especially new SWA Rule 45 sub to client's doctors	Chappell, Milton L	2.7	\$1,080.00
12/11/2020	Disc MBG & JDJ re status & strategy for oral argument re motion to compel SWA discovery	Chappell, Milton L	0.3	\$120.00
				\$2,320.00

Date	Narrative	Attorney	Hours	Amount
9/21/2020	Prep for motion to compel hearing; discuss same with MBG	Jennings, Jeffrey	1.5	\$450.00
10/8/2020	Edit motion to compel	Jennings, Jeffrey	2.0	\$600.00
10/9/2020	Edit motion to compel against Southwest	Jennings, Jeffrey	1.2	\$360.00
10/22/2020	Edit motion to compel	Jennings, Jeffrey	1.0	\$300.00
11/11/2020	Work on motion to compel; send edits to Matt	Jennings, Jeffrey	0.9	\$270.00
12/9/2020	Work on reply brief	Jennings, Jeffrey	1.0	\$300.00
12/9/2020	Work on reply brief	Jennings, Jeffrey	0.5	\$150.00
12/11/2020	Hearing on motion to compel	Jennings, Jeffrey	0.5	\$150.00
				\$2,580.00

Date	Narrative	Attorney	Hours	Amount
10/21/2020	Review correspondence with Matt Gilliam regarding motion to compel.	JW	0.1	\$37.50
10/23/2020	Review draft of motion to compel and suggested revisions from Milton Chappell and Jeff Jennings (.8); call with Matt Gilliam regarding deposition subpoenas, motion to compel and procedures for upcoming depositions (.5); attention to witness fees for deposition subpoenas (.2).	JW	1.5	\$562.50
11/11/2020	Review and revise drafts of motion to compel and brief in support, and emails with Matt Gilliam regarding same.	JW	1.2	\$450.00
11/12/2020	Telephone call with Matt Gilliam regarding motion to compel and other discovery issues.	JW	0.2	\$75.00
11/16/2020	Receive and review filed motion to compel, brief in support, and appendix in support, and calendar response deadline.	JW	0.4	\$150.00
11/25/2020	Telephone call with Matt Gilliam regarding discovery and deposition update and motion to compel.	JW	0.5	\$187.50
				\$1,462.50

Total Expended on First Motion to Compel Against Southwest	\$123,927.50
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